



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 21, 2006

BY FAX

ATTACHED LIST OF COUNSEL

Re: United States v. Douglas Shyne, et al.
S2 05 Cr. 1067 (KMK)

Dear Counsel:

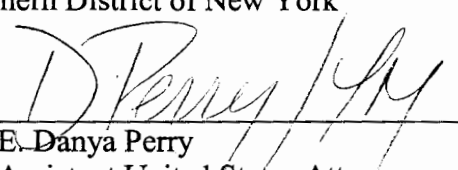
This letter provides continuing discovery pursuant to Rule 16(c) of the Federal Rules of Criminal Procedure. Based on your request for discovery in this case, certain documents received pursuant to subpoena (Bates numbered 4157-6775) will be sent to you by Federal Express tomorrow by our outside copying company, D.I. Solutions.

I will be sending additional materials tomorrow under separate cover to each of the defendants added in the second Superseding Indictment, including any statements, materials recovered incident to arrest, etc.

Please contact me at your earliest convenience concerning the possible disposition of this matter or any further discovery which you may request.

Very truly yours,

MICHAEL J. GARCIA
United States Attorney
Southern District of New York

By: 
E. Danya Perry
Assistant United States Attorney
(212) 637-2434

***** -COMM. JOURNAL- ***** DATE MAR-21-2006 ***** TIME 17:23 *****

MODE = MEMORY TRANSMISSION

START=MAR-21 17:22

END=MAR-21 17:23

FILE NO.=331

STN NO.	COMM.	ONE-TOUCH/ ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	OK	2	912128975824	003/003	00:00:57

-US ATTORNEY -

***** -

- ***** -

212 637 2620- *****

FACSIMILE COVER SHEET

U.S. ATTORNEY'S OFFICE, SDNY
100 CHURCH STREET
NEW YORK, NY 10007

From: AUSA Danya Perry

Office Phone No.: 212-637-2434

Fax Number: 212-637-2660

No. pages (including cover sheet):

Date sent: 3/21/06

CONFIDENTIAL U.S. ATTORNEY FACSIMILE COMMUNICATION

The information contained in this facsimile message, and any and all accompanying documents, constitute confidential information. This information is the property of the U.S. Attorney's Office. If you are not the intended recipient of this information, any disclosure, copying, distribution, or the taking of any action in reliance on this information is strictly prohibited. If you received this information in error, please notify us immediately by telephone at the above number and destroy the information.

To: Michael Fineman

Office Phone No.:

Fax Number: 212-897-5824

Remarks:

U.S. Department of Justice



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 22, 2006

BY FEDERAL EXPRESS

ATTACHED LIST OF COUNSEL

Re: United States v. Douglas Shyne, et al.
S2 05 Cr. 1067 (KMK)

Dear Counsel:

This letter provides continuing discovery pursuant to Rule 16(c) of the Federal Rules of Criminal Procedure. Based on your request for discovery in this case, I have enclosed copies of the following materials:

1. To counsel for defendant Riddick: statements made incident to arrest, materials incident to arrest, and credit report (Bates numbered SR 100-13).
2. To counsel for defendant Alexander: statements made incident to arrest, materials incident to arrest, and credit report (Bates numbered NA 100-21).
3. To counsel for defendant Pitambar: statements made incident to arrest and materials incident to arrest (Bates numbered NP 100-23).
4. To counsel for defendant Watler: statements made incident to arrest and materials incident to arrest (Bates numbered 100-17).
5. To counsel for defendant Ephraim Richardson: materials incident to arrest (Bates numbered ER 100-44). Please note that while we have produced certain of the documents recovered incident to arrest, numerous additional documents were recovered as well at the time of arrest (including notes, bills, mail, three cell phones, a desktop computer, etc.), some of which are in the name of defendant Christine Richardson. Should you wish to inspect these documents, they will of course be made available to you.
6. To counsel for defendant Christine Richardson: Medical assistance applications and related documents and certain of the documents

recovered incident to the arrest of Ephraim Richardson (Bates numbered CR 110-57 and ER 109-44). Please note that numerous additional documents were recovered from Ephraim Richardson as well (including notes, bills, mail, three cell phones, a desktop computer, etc.), some of which are in the name of defendant Christine Richardson. Should you wish to inspect these documents, they will of course be made available to you.

Please contact me at your earliest convenience concerning the possible disposition of this matter or any further discovery which you may request.

Very truly yours,

MICHAEL J. GARCIA
United States Attorney
Southern District of New York

By: 

E. Danya Perry
Assistant United States Attorney
(212) 637-2434

Encls.

FedEx Express US Airbill

FedEx Tracking Number **8558 2827 1402**

Origin (Please print and press hard.) **3/22/06** Sender's FedEx Account Number **1425-8107-8**

Sender's Name **AUSTIN Perry** Phone **212-637-1047**

Company **USDOJ/US ATTY GEN**

Address **1 SAINT ANDREWS PLZ** Dept./Floor/Suite/Room

NEW YORK State **NY** ZIP **10007-1701**

Internal Billing Reference
 (24 characters will appear on invoice.)

Recipient's Name **Michael Finckman** Phone ()

Company

Recipient's Address **305 Broadway, 7th fl** Dept./Floor/Suite/Room

Cannot deliver to P.O. boxes or P.D. ZIP codes.

Address **NY** State **NY** ZIP **10007**

0325538206

SPH43

0215

Sender's Copy

4a Express Package Service

☐ FedEx Priority Overnight
Next business morning * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Standard Overnight
Next business afternoon.* Saturday Delivery NOT available.

☒ FedEx First Overnight
Earliest next business morning delivery to select locations.* Saturday Delivery NOT available.

☐ FedEx 2Day
Second business day.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Express Saver
Third business day.* Saturday Delivery NOT available.

FedEx Envelope rate not available. Minimum charge: One-pound rate. * To most locations.

4b Express Freight Service

☐ FedEx 1Day Freight*
Next business day.* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx 2Day Freight
Second business day.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx 3Day Freight
Third business day.* Saturday Delivery NOT available.

* Call for Confirmation: ** To most locations.

5 Packaging

☒ FedEx Envelope* ☐ FedEx Pak*
Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.

☐ FedEx Box ☐ FedEx Tube ☐ Other

* Declared value limit \$500.

6 Special Handling

☐ SATURDAY Delivery
NOT Available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 3Day Freight.

☐ HOLD Weekday at FedEx Location
NOT Available for FedEx First Overnight.

☐ HOLD Saturday at FedEx Location
Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

Does this shipment contain dangerous goods?
One box must be checked.

☐ No ☐ Yes
As per attached Shipper's Declaration.

☐ Yes
Shipper's Declaration not required.

☐ Dry Ice
Dry Ice, 9, UN 1845 x kg

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging. ☐ Cargo Aircraft Only

7 Payment Bill to: Enter FedEx Acct. No. or Credit Card No. below.

☒ Sender Acct. No. in Section 1 will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

FedEx Acct. No. Exp. Date

Total Packages	Total Weight	Total Declared Value†
		\$.00

† Our liability is limited to \$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability. FedEx Use Only

8 NEW Residential Delivery Signature Options If you require a signature, check Direct or Indirect.

☐ No Signature Required
Packages may be left without obtaining a signature for delivery.

☐ Direct Signature
Anyone at recipient's address may sign for delivery. FedEx 11001-15

☐ Indirect Signature
If no one is available at recipient's address, anyone at a neighboring address may sign for delivery. FedEx 11001-15

519

Rev. Date 9/05-Part #158279-©1994-2005 FedEx-PRINTED IN U.S.A.-SRS



Ship and track packages at fedex.com
 Simplify your shipping. Manage your account. Access all the tools you need.